

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

DEC 17 2015

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

V.

STACEY WILSON AND
CANDACE A. DAVIS,

Defendants.

4:15CR572 RLW/NCC

INDICTMENT

COUNT 1

(Wire Fraud)

The Grand Jury charges:

A. The Scheme to Defraud

1. Beginning on or about November 1, 2013 and continuing through on or about September 30, 2015, in the Eastern District of Missouri and elsewhere, defendants **STACEY WILSON**, hereinafter referred to as “**WILSON**,” and **CANDACE A. DAVIS**, hereinafter referred to as “**DAVIS**,” and persons known and unknown to the Grand Jury did knowingly and intentionally devise and execute a scheme and artifice to defraud and to obtain money by means of material false and fraudulent presentences, and representations and promises.

2. It was part of the scheme and artifice to defraud that:

- a. Defendants recruited others to open checking accounts at federally insured financial institutions.
- b. Defendants obtained checks issued as a result of the fraudulently opened accounts, and checks that had been stolen from others.
- c. In order to artificially inflate the balances of the accounts opened in the names of others, defendants and persons known and unknown to the Grand Jury deposited funds with the fraudulently obtained and stolen checks into the accounts in several ways, including; deposits made in person at bank branches and at drive-up teller windows; at automated teller machines; and, through mobile banking systems such as sending digital images of fraudulent checks.
- d. Defendants withdrew funds from the artificially inflated accounts before the financial institution realized the deposits were fraudulent.

B. The Wire Transmission

On or about April 24, 2015, in the Eastern District of Missouri, the defendants,

**STACEY WILSON AND
CANDACE A. DAVIS**

for the purpose of executing the above-described scheme to defraud, being aided, abetted, counseled, and induced by one another and persons known and unknown to the Grand Jury, did knowingly cause to be transmitted by means of wire communication in and affecting interstate commerce, certain writings, signs, signals, pictures, and sounds, namely an electronic wire transmission through the remote capture system of Deposit Point at U.S. Bank of check number 200 drawn on the account of L.B. in the amount of \$200.00.

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT 2

(Access Device Fraud)

The Grand Jury realleges the facts set forth in paragraph A of Count 1 and further charges that:

Between on or about January 3, 2015 and continuing to on or about June 17, 2015, within the Eastern District of Missouri, the defendants,

**STACEY WILSON AND
CANDACE A. DAVIS,**

being aided, abetted, counseled, and induced by one another and persons known and unknown to the Grand Jury, did knowingly and with intent to defraud use, and attempt to use, unauthorized access devices, that is: debit cards obtained with the intent to defraud in the names of L.K.B., E.D.C., D.A.M., E.S.P., D.Z.M., A.W., T.T.K., B.R.R., D.T., B.S.G., J.C., J.M.R., C.W.D., D.J.T., R.G.C., J.G., G.R.W., B.P., B.W.H., D.L., and, T.L.K., in order to withdraw, and attempt to withdraw, cash from automated teller machines with an aggregate value exceeding \$1,000.00, that being an amount in excess of \$10,000.00.

In violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1), and 2.

COUNTS 3 THROUGH 5

(Aggravated Identity Theft)

The Grand Jury realleges the facts set forth in paragraph A of Count 1 and further charges that:

On or about the dates listed below, within the Eastern District of Missouri, the defendants,

**STACEY WILSON AND
CANDACE A. DAVIS,**

being aided, abetted, counseled, and induced by one another and persons known and unknown to the Grand Jury, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, the names and account numbers of the persons listed below, during and in relation to the commission of the felony offenses of: mail fraud, Title 18, United States Code, Section 1341; wire fraud, Title 18, United States Code, Section 1343; bank fraud, Title 18, United States Code, Section 1344; access device fraud, Title 18, United States Code, Section 1029(a)(2); and, effecting transactions, Title 18, United States Code, Section 1029(a)(5)

<u>COUNT</u>	<u>DATE</u>	<u>IDENTITY</u>	<u>INSTRUMENT</u>
3	March 24, 2015	D.S.	Check Number 153
4	March 24, 2015	D.S.	Check Number 155
5	August 2, 2015	S.D.	Check Number 128

In violation of Title 18, United States Code, Sections 1028A and 2.

A TRUE BILL.

FOREPERSON

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